

Appendix A

Oral and Written Public Comments

Appendix A

Table A-1. Cross-reference for individual comments and their responses.

Comment or Name and Affiliation or Organization (if provided)	Document and Comment No.	Response No(s).
Written Comments		
Paul Randolph	W1-1	35
Charles M. Rice INEEL Citizens Advisory Board	W2-1	7
George Marriott	W3-1	12
	W3-2	30
	W3-3	14
Jared Newman ONYX Environmental Services	W4-1	26
	W4-2	27
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Warren Adler	W5-1	5
John C. Commander, Coalition 21	W6-1	18
	W6-2	24
	W6-3	1
Charles M. Rice INEEL Citizens Advisory Board	W7-1	3
	W7-2	29
	W7-3	31
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Beatrice Brailsford, Snake River Alliance	W8-1	2
	W8-2	8
	W8-3	15
	W8-4	17
	W8-5	19
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	W8-7	22, 34
	W8-8	23
	W8-9	13
	W8-10	9, 36
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Table A-1. (continued).

Comment or Name and Affiliation or Organization (if provided)	Document and Comment No.	Response No(s).
Beatrice Brailsford, Snake River Alliance	IF1-1	15
	IF1-2	36
	IF1-3	13
	IF1-4	22, 34
	IF1-5	4
Vaughn Nebeker	IF2-1	1
Steve Hopkins	B1-1	8
	B1-2	21
	B1-3	25
	B1-4	23
	B2-1	11
	B2-2	17
	B2-3	23
	B2-4	33
Pam Allister	B2-5	24
	B2-6	16
	B2-7	7
	B2-8	8
Chuck Broschious	M1-1	6

Central Facilities Area, Waste Area Group 4
Idaho National Engineering and
Environmental Laboratory Public Meeting

Central Facilities Area Comprehensive Remedial
Investigation/Feasibility Study Proposed Plan

August 17, 1999
Idaho Falls, Idaho
7:00 p.m.

Public Comment

Ms. Brallsford: My name is Beatrice Brailsford. I'm with the Snake River Alliance. We will submit written comments

I think I do finally—and I do understand that CERCLA and RCRA address different concerns. I do think that the difference between a RCRA landfill and a CERCLA Superfund cleanup site is a number of years. It could be 30 years or 100 years or 1,000 years. So, in the real world, there are some similarities.

IF 1-1

IF I think I finally, honestly, just now figured out the chronology for the soil dump. We signed a ROD, decide to build a soil dump, and then start working on the criteria, beyond that it's CERCLA waste. We start looking at what really is appropriate to put above the aquifer or leave above the aquifer, to move above the aquifer. The way we figure out what is appropriate to put above the aquifer is we go back through all the cleanup plans and see what we've already decided to put there. And then we figure out what is in that waste, and that is the waste that we allow in the soil dump.

IF 1-2

I think that you might have some problems with that. I'm not sure that that is the appropriate way to go about making that decision of both, whether to have one, and hat to put in it.

I think given the fact that at some point a RCRA dump becomes a Superfund site, whenever we're looking at these cost estimates and we look at the one-time disposal fee, I think that is being overly optimistic.

IF 1-3

I am becoming more nervous about this 10-foot basement scenario, that it's okay to leave pollution if it's deeper than 10 feet. As far as I can see, all it means is that you're leaving the waste that is 10 feet closer to the aquifer, and you're not ruining its head start.

IF 1-4

And that's it. I guess just one more thing. I hope I never understand DOE's version of tidy, but to read that we take powdered mercury and left it on the surface and we buried roofing material is just irrational. Thank you.

IF 1-5

Mr. Simpson: Thank you. Anyone else? Vaughn, any comments?

Mr. Nebeker: My name is Vaughn Nebeker, N-e-b-e-k-e-r. I'm the original author and inventor of the technologies which put out Chernobyl, hydrogen bleed-off system at Three-Mile Island, Charilabalnck, and also did the cap that let out LR-1 in Iraq. In putting out the eight atomic nuclear reactors, I'm still batting at 110-percent average. And I always design my own equipment technologies. And sometimes I wonder why sometimes they have so low standards in the DOE. Whereas as a private contractor, I've always tried to have higher and more-efficient standards. Thank you.

Mr. Simpson: Anyone else?

Mr. Freund: I'm George Freund, F-r-e-u-n-d., Coalition 21, and we will submit our comments in writing.

Mr. Simpson: With that, I would like to remind people that the comment period for this project remains open until September 4, 1999. The next time we'll be having public cleanup meetings will be in the fall of 2001 to discuss the Operable Unit 10-04 options. Operable Unit 10-04—I'm going to try to get most of these sites—includes EBR-1 and BORAX sites, the Organic Moderated Reactor Experiment, the site training facilities, the ordinance areas, and various other Waste Area Groups, 6 and 10 site.

Once again, that will be in the fall of 2001. And that is very close to the time frame that the nitrate investigation will be, and we will have a proposed plan for the Central Facilities Area.

With that, thank you for coming. Good night.

(Meeting concluded at 8:40 p.m.)

Central Facilities Area, Waste Area Group 4
Idaho National Engineering and
Environmental Laboratory Public Meeting

Central Facilities Area Comprehensive Remedial
Investigation/Feasibility Study Proposed Plan

August 18, 1999
Boise, Idaho
7:00 p.m.

Public Comment

Steve Hopkins: I just have a few short comments. First of all, I have been concerned when it comes to writing these cleanup path plans. In some of the articles I've seen involving DOE officials commenting on past INEEL activities that is in a substantial amount of revision of history going on. And it may seem to be a minor point, but I think you have to be honest about what has gone on at INEEL in the past, referring to previous research activities as resulting in contamination is definitely a euphemism.

B1-1

Basically you're talking about nuclear weapons work. This was a site that was very key in reprocessing bomb-grade uranium used to produce tritium and plutonium at Savannah River. So, I think you should be a little more honest about exactly where the contamination stemmed from.

Some other comments, in terms of good points, I like the fact that—with this particular plan, as opposed to the other plans, there is not as much, for lack of a better word, dinking with the waste like with the soil searcher with WAG that didn't pan out. At least in this case, you're looking at experimenting for the sake of experimenting. It appears that you're going forth with the best available technology even though there may not be any truly real good solutions. It appears that you've selected the best ones.

B1-2

Also, I would like you to consider—and a WAG 5 is sort of the model for this, that you look further at sites that you can potentially remediate for less of a cost than monitoring or perhaps not as a significant cost in addition to monitoring. As you stated, with the WAG 5 clean-up plan, some sites were cheaper to remediate than monitor.

B1-3

Approximately, half of the remediated activities so far in terms of Records of Decisions that have been signed involving WAGs have been essentially just a cap, very crude cap, at that, just made of soil. Whereas, with this cap, it looks like there is actually some thought into designing it for it to last for more than a few years.

B1-4

Although, of course, when you say containment, you're only talking about containment on the top and not the bottom, but at least it appears to be a better design than the previous caps.

And that is all I have at this time. Thank you.

Mr. Simpson: Thank you.

Audience Member: My name is Pam Allister, and I'm the executive director of the Snake River Alliance... Thank you very much for your attention and courtesy this evening. I have a list of comments in no particular priority or flow. I'd like to comment that I found that Table 1 was confusing. And that there with you a sense for me—and I consider myself a lay reader, as a mixing of apples and oranges with a final case of lemons for the risk. It was too quick a table for looking at the risks, because we were looking at cancer-causing elements and also toxics, and lead, which has its own particular kind of uptake criteria. So, I suggest an expansion some how of Table 1, or Table 1 like graphs in the future.

B2-1

I also felt uncomfortable with not including the current occupational scenario in this review. I am hopefully optimistic that there is careful attention being given to the workers at the Central Facilities Area, given the large number of them of 800. And that it is flagged carefully for workers' safety that the nitrates and tritium that is in the groundwater, as that investigation continues at the Central Facilities, is given careful attention, particularly in light of the recent federal revelations. We cannot be too careful with observing and protecting our workers from risk in Idaho.

B2-2

I also thank you very much for your acknowledgement that capping is not containment. It takes care of the top but not the bottom. I'm not opposed—I will speak for myself as one member of the alliance. In this case, I'm not opposed to off-site disposal and the moving forward with this particular clean-up project as fast as possible. However, I am uncomfortable with the decision-making process that was seemingly based on expedience rather than what might be best for the environment. I pose that as a question. I don't have the answer for if it's better stored north or south 300 miles.

B2-3

B2-4

Also, I'm beginning to wonder about the waste acceptance criteria for the on-site disposal. I talked with my colleagues who were at last night's meeting, and we do continue to ask that there be good public involvement with setting up the criteria for that facility, especially in a closely affected area of the state.

B2-5

In reference to the cost analysis, this hasn't come up for quite the same way as it did this evening, but looking at the variability and the off-site disposal, I'm wondering about the cost—I need to do my homework, I guess and look at this other document, but what is driving this variability and cost for off-site disposal, I'm assuming its market driven, however, I think that we need to bring in the factor of environmental risk and the long-term lifetime cost of disposal and bring to our own awareness the values issue of the lifetime cost of past and current DOE activities.

B2-6

I also thank Erik for his informal okay for us to get some of our written comments after Labor Day because Friday I'm going on vacation. I want to forget about this for a couple weeks.

B2-7

Lastly, I would like to reiterate what my colleague Steve Hopkins mentioned. I find the first sentence or two of this introduction euphemistic. The 1300 dues-paying members of the Snake River Alliance are very concerned about nuclear weapons production activity, whether they are past, current, or in the future. And it feels very much like a glossing over to say research activities when we know that these activities were

B2-8

actually related to tools and instruments, great destruction to the human health and the environment both now and in their intent as weapons. Thank you.

B2-8 cont.

Mr. Simpson: Thank you. Any other comments? Well then, with that, I would just like to say that the comment period for this project remains open until September 4th. The next time we will be holding clean-up meetings will be about two years from now. In fact, it will be kind of a horse race between this 413b investigation dealing with the nitrates in the groundwater, the Central Facilities Area, or the Operable Unit 10-04 investigation. And that investigation deals with the organic moderated reactor experiment and the site training facilities ordinance area, the Experimental Breeder Reactor 1 and Boiling Water Reactor Experiment Facilities and other site within WAGs 6 and 10. With that, thank you for coming and good night.

(Meeting concluded at 8:45 p.m.)

**Central Facilities Area, Waste Area Group 4
Idaho National Engineering and
Environmental Laboratory Public Meeting**

**Central Facilities Area Comprehensive Remedial
Investigation/Feasibility Study Proposed Plan**

**August 19, 1999
Moscow, Idaho
7:00 p.m.**

Public Comment

Audience Member: Chuck Broschius, executive director of Environmental Defense Institute, Troy, Idaho. As I've said many times over the years, all the agencies, not only the Department of Energy but also the regulatory agencies have an obligation that when they convey information to the public that it be accurate and that it tell the whole truth and not be anything less than that.

Since DOE is the polluter, the public might even expect that they might not always tell everything there is to know that the public may need to know about what is happening in the process. But what is not acceptable, from our point of view, from the public's point of view, is that when we have regulatory agencies whose mandate is to track these things and force the law, and when they have their logo on these documents that go out to the public, we have an expectation that they do accurately reflect the whole truth and not a selected part of the truth.

Over the years, I can't say I have ever seen one of those plans go to the public that I could say accurately reflected the truth, the whole truth. That when I go and do my own research into the administrative record and look at the sampling data and find radically different numbers than is the document that goes out to the public, and I see this consistently year after year after year, it becomes a kind of problem that can't be attributed to a single oversight or a single mistake by somebody that missed something because it's too consistent. And the only thing that we're left with is that there is a deliberate effort on part of all the agencies not to be fully honest about what the extent of the problems are.

If what we found, if there were inaccuracies in there that covered that were too low or too high, we could say, well, there is not a consistent pattern here. But there is a pattern. And the numbers are always way too low, consistently. There is a problem here.

And if you wonder about how the public responds to you and if you wonder about whether you have any credibility, you can look at this and find out why you have no credibility, why the public doesn't have any faith in this process, and why this is an empty room. I'm here because it's in my job description. That is what I do. I don't get paid for it. I'm unpaid staff. But as a member of that organization, that is what my

M1-1

board of directors has asked me to come and represent our organization so that, at least, you get some feedback from somebody telling you it's not working and we don't believe you and we don't have any faith in you, and that we don't think that you're going to do the right thing. And you can ask Ruel, a number of years ago—ask him the next time you see him. There was a meeting in Idaho Falls when Grumbly was still undersecretary, he was there. I think it was an EMAC meeting or something like that. And I went up to Tom, I said, "The only thing you guys bloody understand is a court order. You know, this is just spinning our wheels. We never get anywhere with you unless we go to court and a judge tells you that this is what you're going to need to do." And even then they ignored it. Penna almost went to jail. He was cited in contempt by the court because he never followed through on the PE EIS. And, finally, they settled it, but even then—I mean, how many years did that take, probably near a decade.

But that is the only thing you understand is a court order. I will tell you under no uncertain circumstances that that is where I'm putting my work right now. That's where I'm going to spend my time. I'm going home. Have a safe trip.

(Meeting concluded at 8:40 p.m.)

Please return
this form by
September 4, 1999

What's Your Opinion?

The Agencies want to hear from you to decide what actions to
take at the Central Facilities Area.

WAG 4 Comments

Dear Kathleen -

My comments remain consistent over the
years. *get the cap off the top of the Aquifer
before it's too late - otherwise it's lost.
This plug isn't going to go away - but it
must be moved from atop this water table.
Don't you think?

W1-1

* Please

Best Regards - PR

W2-1

* If you want a copy of the Record of Decision and Responsiveness Summary,
make sure your mailing label is correct.



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Erik Simpson 6-4373

Citizens Advisory Board

Idaho National Engineering and Environmental Laboratory

CAB-99-091

August 27, 1999

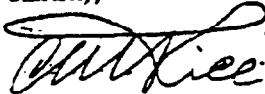
Kathleen E. Haine, Director
Environmental Restoration Program
U.S. Department of Energy
850 Energy Drive
Idaho Falls, ID 83401

Dear Ms. Haine:

Thank you for the opportunity to review the WAG 4 proposed plan. While we realize that the public comment period is presently scheduled to end on for August 31, we request an extension until September 14 to allow the full board to reach consensus on its recommendation regarding the same at the Board meeting scheduled on that date.

Thank you for your consideration of this matter. I am in hopes that this request can be accommodated for a thorough review and response.

Sincerely,



Chuck Rice
Chair, INEEL CAB

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W3-1

W3-2

W3-3

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2-2

Waste Area Group 4 Proposed Plan

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- Comment Form -

AUG

Eric Lempson
6-4373

~~From:~~ This postage paid return mail comment form is provided for your convenience in submitting written comments to DOE, EPA and the state of Idaho concerning the Central Facilities Area proposed cleanup plan. Please provide your name and mailing address if you would like to receive a copy of the Record of Decision and Responsiveness Summary that addresses public comments received on this project.

Name: George Harriott

Address: P. O. Box 302 City: Rigby State: Idaho Zip: 83442

Reference Monday August 16, 1999 article in the Post Register "18 Million
cleanup proposed for INEEL's Central Facility Area". I also understand
this figure could be plus or minus 50%. It is not my intent to eliminate
employment or to stop reasonable cleanup. However I believe the 18 Million
is exorbitant for the CFA project. Would be more reasonable to spend this
money at CPP. I have heard the money comes from the "Superfund". Regardless
of the source, it comes from tax dollars and should be spent wisely.

W4-1

I am familiar with the CFA complex, having worked at the site from 1953-89.
The CFA laundry as I remember handled low level radioactive contaminated
anti-c's. Many of the isotopes had short half lives i.e. ^{50}Co 5.3 years,
some long half lives i.e. ^{137}Cs , 30 years. I can't imagine the residue
from the laundry waste water being that large a project. I do not claim to

W4-2

be an expert on the subject of cleanup but common sense tells me this
proposal has a lot of fat in it. I recommend a panel of experts evaluate
this project. 18 million dollars is not a large amount of money as far
government projects go but it is a large amount of money for city, county,
and even state governments are concerned.

W4-3

Eric Lempson 8/18/99

(continued next page)

P.1

NO. 31 99 06:26AM PLANT & ENVIRONMENTAL RESTORATION

WAG 4 COMMENTS

Jared Newman
Project Manager
ONYX Environmental Services, L.L.C.
(formerly known as Waste Management Industrial Services or Advanced Environmental
Technical Services(AETS))

I work for a division of our company that does environmental cleanup at customer locations. Having done this for the past 16 years, I have managed various stabilization projects with the use of kiln material. I have done both "On-Site" and "Off-Site" stabilization projects. I also manage the distribution/disposal of the drum quantities of non-radioactive hazardous waste for the INEEL.

After reading the proposed plan for the CFA Disposal Pond cleanup I was surprised there is such a difference in cost of Alternative 3a and 3b. What would make such a difference? I wonder if the entire scope of work was considered for both alternatives. Could the off-site option have been overestimated? Has there been talk of having just the "RCRA 796 cubic yards" sent for off-site disposal, and the remaining "untreated" soil disposed of on-site?

Here are some operational and cost items I would submit for consideration:

ON-SITE Stabilization disadvantages:

- Requires substantial mixing and material setup time to allow for proper treatment.
- Requires more personnel and equipment for a much longer period of time.
- Requires more preparations and logistics.
- High volume unloading and mixing of kiln or "Portland cement" can be a real esthetic problem because of the small particle size (a continuous large white cloud). Controls can be used, which could be expensive and/or difficult to use due to the typical INEEL windy conditions.

W5-1

I have found that, in many cases it is much easier and in some cases, less expensive (all things considered) to dig it up and ship it off. With a large volume of material, prices can be reduced considerably.

Most of my work is in talking with INEEL personnel, so if anyone would care to talk to me about this or other non-radioactive remediation projects, feel free to pass my name along. I would be interested in a copy of the Record of Decision and Responsiveness Summary.

Thank You,
ONYX Environmental Services, L.L.C.

Jared Newman
Jared Newman
5111 W. Alworth, Unit G
Garden City, ID 83714
Phone (800) 735-8966, E-mail jared_newman@AETS



adlermoval@aol.com on 09/07/99 09:33:39 AM

To: Steven K Baker/SKB/LMITCOR/INEEL/US@INEL
cc:

INEEL
SEP 07 1999

Subject: Comments on CFA Proposed Plan

COMMUNITY P...
COCK... ..

Message Content From Comments.htm

Sender Name
Warren Adler

Project Name
CFA

Comments

I am a resident of Jackson Hole, Wyoming. There is a hysteria building here on the question of incineration of nuclear waste from your facility. Money has been raised for a concerted push against your present plan. My own view is that there is more hysteria than science here. What I would like is some arguments to counter this hysteria. Are there real dangers in the incineration process? Is the area around INEEL safe? Has there been more cases of cancer in the area of INEEL than elsewhere? There seems to be a great deal of ignorance about the science of this technology. There is also a great deal of distrust of anything the government suggests which, frankly, offends me. Could you enlighten me so that I might enlighten my neighbors. Thanks Warren Adler

W6-1

W6-2

W6-3

To: Steve Baker 6-4373
From: Paul Hethaway

What's Your Opinion?
The Agencies want to hear from you to decide what actions to take at the Central Facilities Area 9/2/99

WAG 4 Comments: The risk assessments for WAG 3 are based upon The Linear NoThreshold Theory, which has no scientific basis. Therefore decisions based upon the derived risks are ^{very inaccurate} ~~inaccurate~~. Radiation safety levels prepared by The Health Physics Society to provide a comparison of risks and costs associated with the proposed actions. We support the concept of a single on-site ^{new} disposal facility to be located at the INTEC. We support the general principle of getting on with the disposal or remediation actions ^{that} are technically appropriate and ~~and cost effective approach.~~

The comments reflect the opinions of Coalition 21

{ No
comments
this
page }



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Citizens Advisory Board

Idaho National Engineering and Environmental Laboratory

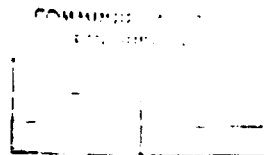
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SEP 29 1999

September 28, 1999

Kathleen E. Hain
Environmental Restoration Program
U.S. Department of Energy, Idaho Operations Office, MS 3911
P.O. Box 1625
Idaho Falls, ID 83401



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Dear Ms. Hain

Note: The Site-Specific Advisory Board (SSAB) for the Idaho National Engineering and Environmental Laboratory (INEEL), also known as the INEEL Citizens Advisory Board (CAB), is a local advisory committee chartered under the Department of Energy's (DOE) Environmental Management SSAB Federal Advisory Committee Act Charter.

The INEEL CAB reviewed the Proposed Plan for Operable Unit 4-13A Interim Action, Waste Area Group 4 (WAG 4), Central Facilities Area at the Idaho National Engineering and Environmental Laboratory. Enclosed is a copy of the INEEL CAB's recommendation #62, addressing the Proposed Plan. The recommendation was approved through consensus by the full CAB at our September 1999 meeting. I might add that we appreciated your willingness to extend the public comment period to allow our participation.

We await DOE-ID's response to this recommendation.

Sincerely,

Charles M. Rice
Chair, INEEL CAB

cc: Dave Rydallch, INEEL CAB Environmental Restoration Committee Chair
Beverly Cook, DOE-ID
Jerry Lyle, DOE-ID
Carol Hathaway, DOE-ID
Martha Crosland, DOE-HQ
Fred Butterfield, DOE-HQ
Larry Craig, U.S. Senate
Mike Crapo, U.S. Senate
Mike Simpson, U.S. House of Representatives
Helen Chenoweth, U.S. House of Representatives
Lauri Noh, Chair, Idaho Senate Resources and Environment Committee
Golden C. Linford, Chair, Idaho House of Representatives Resources and Conservation Committee
Jack Barracklough, Chair, Idaho House of Representatives Environmental Affairs Committee
Gerald Bowman, DOE-ID
Kathleen Trever, State of Idaho INEEL Oversight
Wayne Pierre, U.S. Environmental Protection Agency Region X

W7-1

W7-2

W7-3

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Citizens Advisory Board
Idaho National Engineering and Environmental Laboratory

**Proposed Plan for Operable Unit 4-13A Interim Action, Waste Area
Group 4 (WAG 4), Central Facilities Area, Idaho National Engineering
and Environmental Laboratory**

W7-3
(cont.)

W7-4

The INEEL CAB reviewed the Proposed Plan for Operable Unit 4-13A Interim Action, Waste Area Group 4 (WAG 4), Central Facilities Area at the Idaho National Engineering and Environmental Laboratory. The document was well formatted and easy to understand. We particularly appreciated the "Consumer Reports"-type tables. We have four recommendations to make on the document.

We understand that the term "interim action" is defined under the Comprehensive Environmental Remediation, Compensation, and Liability Act as any action that will not result in full remediation. We understand that some contamination sources at WAG 4 are not addressed by this Proposed Plan, hence the title of the document refers to it as an "interim action." We sincerely hope, however, that the proposed remedial actions described in the Proposed Plan will constitute final remedies for the contamination sources they are designed to address. The CAB has repeatedly expressed frustration at cleanup efforts that must be repeated, at great cost to taxpayers, because prior efforts were incomplete. **The INEEL CAB recommends that all remedial actions taken at WAG 4 completely and finally address the contamination present to avoid a need for follow-on remediation.**

We understand that the contaminant of concern in the Disposal Pond is mercury. We also understand that analysis (based on the Toxicity Characteristic Leachate Procedure) of sediment from three of the 88 sampling locations in the pond bottom supports a conclusion that the sediment meets the definition for hazardous waste under the Resource Conservation and Recovery Act. We question, however, why phytoremediation was ruled out as an alternative technology that could be less costly than the preferred alternative. In addition, the \$9.9 million estimate for operating and monitoring costs under Alternative 4 seems very high. **The INEEL CAB recommends further evaluation of alternative technologies to reduce the costs associated with cleanup on the disposal pond.**

Text describing the preferred alternative for the Sewage Treatment Plant Drainfield states that "in approximately 189 years the risks from the Cesium-137 contamination at the site would decrease to a level below the human health risk threshold." Table 5 states that Cesium-137 has a half-life of 30 years. The table leads us to a conclusion that the Cesium-137 would decay to acceptable levels in 90 years rather than 189 years. A presentation to the CAB explained the concept of a "preliminary remediation goal" which was, unfortunately, not well explained in the Proposed Plan. The document simply does not provide an adequate explanation for why it would take 189 years to achieve acceptable risk based levels. **The INEEL CAB recommends clarification of these apparent discrepancies and/or inadequate explanations. We cannot support the**

selection of Alternative 4 as the preferred alternative without a better understanding of how long it will take the Cesium-137 to decay to acceptable levels.

We appreciated the addition of items for informational purposes throughout the text (marked with an "info" icon), with one exception. The INEEL CAB feels that the text located under the info icon on page 20 raises a flag related to polychlorinated biphenyls (PCBs). There was no obvious need to raise unnecessary public concerns, particularly given the very low level of PCBs detected at WAG 4. The INEEL CAB recommends against the inclusion of alarmist information that serves no purpose in the document.

} W8-1

} W8-2

} W8-3



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Comments on the Proposed Plan for
Operable Unit 4-12A Interim Action
Waste Area Group 4—Central Facilities Area
Idaho National Engineering and Environmental Laboratory

Snake River Alliance

October 5, 1999

The following comments and questions are submitted on behalf of the 1,300 members of the Snake River Alliance, an Idaho-based grassroots group that has monitored activities at the Idaho National Engineering and Environmental Laboratory since 1979.

The current plan doesn't seem to have any particular tricks in it (eg. soil sorter, moon shot). That's probably a good thing.

The first page of the plan says that "research activities" at INEEL left behind contaminants. The majority of contamination, certainly the most perilous, came from weapons production activities.

At the Idaho Falls public meeting on this plan, the discussion of what waste goes where highlighted an area of confusion: The waste "classifications" used for INEEL cleanup are not always physical or chemical; they are sometimes legal(istic) or even political. For example, it has never been explained satisfactorily why it's okay to put waste from decontamination in the Radioactive Waste Management Complex even though it's not okay to put environmental restoration waste there. Further, when Site officials were asked to compare the waste currently going to RWMC or proposed for the soil dump with that currently being burned at the Waste Experimental Reduction Facility, the response was that WERF is treating off-site waste. That is a political definition that does not address treatment impacts. Later clarification that WERF does not burn soils was a more helpful distinction.

Unfortunately, that brought up another source of confusion that is outside the scope of this plan but well within the scope of INEEL cleanup. BNFL officials have said on more than one occasion that the Advanced Mixed Waste Treatment Project could burn the soil from Pit 9. RWMC personnel don't necessarily seem to agree.

W8-4

W8-5

W8-6

W8-7

W8-8

W8-9

W8-10

W8-11

It's not clear why only future occupational health risks are considered (Table 1), particularly given the loose mercury-contaminated calcine. Do those not pose a current occupational health risk as well? When does the future begin for the occupational scenario?

It is still not clear why the cumulative excess cancer risk for uranium-238 and arsenic were collapsed in Table 1.

Some INEEL cleanup plans are based on the premise that it's okay to leave pollution where it is if it's already deeper than 10 feet. All that seems to do is maintain the headstart towards the Snake River Aquifer that particular contamination already has.

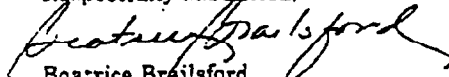
Please note that, even when caps seem adequate, which the one for the disposal pond does, they are not containment. Contamination is covered but left open at the bottom, the side nearest the aquifer.

Given the general acknowledgement that the only difference between a RCRA disposal facility and a CERCLA cleanup site is some number of years, the assumption of a one-time disposal fee probably has more to do with INEEL's budget than with taxpayer costs.

At the Idaho Falls meeting on this plan, I became confident that INEEL recognizes the need for some sort of public involvement in setting the soil dump waste acceptance criteria. Please pursue this matter.

Imagine the consternation caused by contemplating a two-year gap between cleanup meetings! What will we do with our time? I suggest INEEL offer quarterly briefings/meetings on all cleanup activities—progress and problems. It would be best if the Department of Energy, regulators, and contractors were all regularly available.

Respectfully submitted,


Beatrice Brailsford
Program director